

**IN THE UNITED STATES DISTRICT COURT OF
THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

**BETTY NORMAN
ALFRED NORMAN**

PLAINTIFFS

VS.

CIVIL ACTION NOL 3:20-CV-418-DPJ-FKB

**GEICO INSURANCE,
JOHN DOE COMPANY 1-5,
and JANE DOE 1-5**

DEFENDANTS

**PLAINTIFF’S MOTION TO CONSOLIDATE ALREADY DISCOVERY RFA,
RFP, AND INTERROGATORY REQUEST PURSUANT OT F.R.C.P. 42 AND
APPLICABLE 5TH CIRCUIT CASE LAW and WHICH HAS ALREDY BEEN
ANSWERED BY PLAINTIFFS’ IN STATE COURT OF THIS MATTER and
CAUSE AN ORDER REGARDING ANY LIMITED QUESTIONS TO NEW
CLAIMS BY PLAINTIFFS**

COMES NOW, Plaintiffs’ Betty and Alfred Norman, by and through their attorney of record and respectfully files this motion to consolidate discovery Request of RFA, RFP, and Interrogatory request which were propounded and answered in the removed from state court civil action NO. 25CO1:19-CV-0458 and into district court case as captured before this honorable court today.

As such, Plaintiff will show this honorable Court to wit:

1. Plaintiffs' motion is brought under 5th Circuit holdings as found in Plaintiff's corresponding memorandum of case law and under F.R.C.P. 42.
2. Shown in **exhibit A** of this motion the Hinds County County Docket Sheet showing Defendant GEICO INSURANCE at Doc.[13, 14, and 15] discovery request for RFA, RFP, and Interrogatory request. As well as Plaintiff's response to the same at Doc.[34, 35, and 36].
3. Plaintiff further demonstrates to the court Plaintiffs answers to Defendant GEICO INSURANCE'S RFA, RFP, and Interrogatory questions hereto attached as **exhibit B Doc.[34, 35, and 36]**.
4. Moreover, Plaintiff respectfully submit to this honorable court Defendant GEICO INSURANCE'S RFA, RFP, and Interrogatory request, whereby even then GEICO INSURANCE, in its attempt to disrupt the flow of litigation requested 105 RFA questions, 29 Interrogatory questions, and 34 RFP questions, hereto attached as **exhibit C**.
5. As a result, Plaintiff has properly and timely already answered discovery in this matter and where Defendant attempted to seek 105 RFA questions, Plaintiff responded to a reasonable and what is the typical number of RFA questions allowed in district court. Moreover, it is reasonable to say that such an extensive list of questions were submitted in an effort to disrupt the normal flow of litigation in state court to allow Defendant time to have the matter removed to district. As a result, the matter was removed and litigation has pursued in this honorable court.

6. Therefore, based upon the fact and the law in the corresponding memorandum filed immediately and separate from this motion Plaintiff respectfully ask the court to ***grant*** the consolidation of the discovery request that has already been propounded. Plaintiff further request that if the court finds that due to some of the additional claims in Plaintiffs amended lawsuit to allow specific additional discovery requests as to only those new specific discovery items only that might be deemed by the court as different and are reasonable,

RESPECTFULLY SUBMITTED this the 4th day of February, 2021

By Plaintiffs':

Betty and Alfred Norman

/s/Abby Robinson (MBN. 105157)

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CERTIFICATE OF SERVICE

I the undersigned declare that on February 4, 2021, I have filed this document with the court, electronically, and such system will deliver a copy to all parties.

/s/Abby Robinson (MBN. 105157)

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